

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KLEEN PRODUCTS LLC, <i>et al.</i> ,)	
individually and on behalf of all those)	
similarly situated,)	
)	
Plaintiffs,)	Case No. 1:10-cv-05711
)	
v.)	Hon. Harry D. Leinenweber
)	
PACKAGING CORPORATION)	
OF AMERICA, <i>et al.</i> ,)	
)	
Defendants.)	

**PLAINTIFFS' MOTION FOR LEAVE
TO FILE MOTION IN EXCESS OF PAGE LIMITATIONS**

Plaintiffs move this Honorable Court for leave to file Plaintiffs' Motion for Preliminary Approval of Proposed Settlement, Certification of Settlement Class, Appointment of Class Counsel for the Settlement Class, Authorization to Disseminate Notice to Settlement Class, and Setting a Hearing on Final Settlement Approval ("Settlement Motion") in excess of the 15-page limit set by Local Rule 7.1. In support of their Motion, Plaintiffs state as follows:

1. Plaintiffs request leave to file the Settlement Motion in excess of 15 pages for preliminary approval of a proposed settlement agreement with Defendant Packaging Corporation of America.
2. Additional pages are requested to sufficiently describe the complexity of the proposed settlement agreement and how notice will be disseminated to class members. Specifically, the Settlement Motion will address (1) the procedural history of the litigation, (2) the terms and conditions of the proposed settlement agreement with Defendant Packaging Corporation of America, (3) the applicable standards for determining whether a proposed

settlement is fair, reasonable, and adequate as to the settlement class, and (4) the procedures by which Plaintiffs will disseminate notice to class members.

WHEREFORE, Plaintiffs respectfully request that this Court grant them leave to file Plaintiffs' Settlement Motion exceeding 15 pages, but no more than 22 pages.

Dated: April 16, 2014

Respectfully submitted,

/s/ Michael J. Freed

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